

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: WILLIAM HUNNEKE

Facility ID Number: NCR000156877

Facility Name: RITE AID #11534

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: Re-notified as CESQG. No violations.

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Author(s) of Document: William Hunneke

Inspector ID #: NC060

Suborganization: Eastern Region

County (if not on report): CRAVEN

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY INFORMATION:

Facility Name: **RITE AID #11534**

EPA ID Number: **NCR000156877**

Type of Facility: Conditionally Exempt Small Quantity Generator CESQG.

Facility Location: 101 W Main Street, Havelock, NC 28532-2655
Craven County

Telephone Number: 252-447-6303

Mailing Address: 30 Hunter Lane, Camp Hill, PA 17011

Property Owner: Stanhope Apartments, LLC
Property Owner Address: PO BOX 3165, Harrisburg, PA 17105

Operator: Eckerd Corporation
30 Hunter Lane Camp Hill, PA 17011

FACILITY CONTACTS:

Telephone: Davis W. Crozier, Manager Env. Health & Safety
717-975-8643

E-mail: EHS@riteaid.com

Store Manager: Sharon Hill
Telephone Number: 252-447-6303
E-mail: shill@riteaid.com

DATE OF SITE VISIT: **March 15, 2016** onsite: 1500 hrs. offsite: 1605 hrs.

PARTICIPANTS:

Representing Rite Aid #11534: Sharon Hill
Representing NCDEQ: William Hunneke

PURPOSE OF SITE VISIT:

Compliance Evaluation Inspection to determine compliance with regulations described at 40 CFR 261, 262, 264, 265, 268 and 273. The facility was provided a compliance assistance evaluation December 11, 2014. There is no record that this facility had been inspected prior to December 2014 evaluation.

FACILITY DESCRIPTION:

Rite Aid #11534 operates as a retail pharmacy also selling groceries and a variety of household items. It is part of a national chain and is provided guidance for compliance with the hazardous waste management regulations by the Rite Aid corporate office and by their contracted waste management companies.

The facility uses a bar code system as a guide in waste determination and handling of hazardous wastes. The system makes a determination of either "hazardous waste", "trash" or "return to distribution warehouse". Waste deemed as hazardous is placed into clear plastic "zip lock" bags. If the material packaging is broken and the material is leaking, absorbent is added and the material is double bagged. The bags are placed into plastic lined 15-gallon plastic containers with snap tight lids for storage.

The approximately 8,000 square foot building is located on a 1.75 acre parcel and is serviced by municipal water and sewer. The facility is open to the public from 8 AM until 10 PM and employs approximately twelve to fifteen individuals. There are no known wells on the subject property and the distance to the nearest off site well is unknown. The distance to the nearest residence is approximately two hundred feet. The facility re-notified NC DWM as a CESQG of hazardous waste on December 7, 2015 and currently appears to be operating as such. If the facility generates greater than 2.2 pounds of acute hazardous waste on-site at any time they would be operating as a large quantity generator (LQG). The facility was observed to in compliance with many but not all LQG requirements. Those requirements are described in the report for informational purposes.

WASTE STREAMS:

Hazardous waste is generated primarily from returned, defective or broken merchandise from the sales floor or from the pharmacy in the form of expired, returned or off-specification pharmaceuticals. Waste streams typically generated may include:

- | | |
|---|-----------------------------------|
| • Waste Aerosols | D001 |
| • Naphthalene, Sulfur | D001/U165 |
| • Sodium Hydroxide, Potassium Carbonate | D002 |
| • Waste Flammable Liquids | D001 |
| • Waste Flammable Liquids (xylene, toluene) | D001/D018/D035/U022 |
| • Waste Oxidizing Liquids (hydrogen peroxide) | D001 |
| • Waste Compressed Gas | D001 |
| • Waste Flammable Solids | D001/U165 |
| • Waste Toxic Solids (Pyrethroids, Selenium) | D010 |
| • Waste Toxic Solids (M-Cresol) | D024 |
| • Waste Toxic Solids (warfarin, nicotine) | P012/P075/P188/P081/P024/P108 |
| • Waste mercury, | D009 |
| • Used batteries | Observed on manifests. |
| • Used lamps | Removed by electrical contractor. |

AREAS OF REVIEW AND EVALUATION:

Manifests and Land Disposal Restriction (LDR):

Hazardous waste manifests were reviewed from December, 2014 through the present and were observed to be in compliance and complete with Land Disposal Restriction documents.

HW Transporters:

Companies that transport hazardous waste from the subject site include:

- | | |
|-------------------------------|-----------------------|
| • EQ Industrial Services | EPA id#: MI0000263871 |
| • AR Paquette & Company, Inc. | EPA id#: FLD982105884 |
| • EQ Industrial Services | EPA id#: MIK435642792 |

HW TSD's:

Companies that treat, store or dispose of hazardous waste from the subject site include:

- EQ Detroit EPA id#: MID980991566

Emergency Preparedness/Arrangements with Local Authorities:

The facility has a fire suppression system, spill clean-up supplies, fire extinguishers, public announcement (PA) system, audible fire alarms and emergency information posted by most phones. The facility could not produce documentation or describe the arrangements made with emergency authorities. As this is a LQG requirement it does not represent a violation.

Contingency Plan:

The facility has a contingency plan entitled "Emergency Action, Fire Prevention, and Hazardous Waste Contingency Plan" (The Plan) that describes the actions personnel must take to respond to emergency incidents such as fire, explosion and any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil or surface water. The Plan listed Lori Camp-Rogan as Emergency Coordinator and two alternates: Chad Duvall, Pharmacy District Manager; and Chad Miller, Asset Protection Manager. The Contingency Plan was observed to be in compliance. There was no evidence that the contingency plan had been sent to emergency authorities. As this is a LQG requirement it does not represent a violation.

Training Records:

Training records were reviewed and observed to be in compliance with LQG rules.

Inspection Records (storage):

Inspection records were reviewed from January 2015 through the present and observed to be in compliance with LQG rules.

Hazardous Waste Areas:

The store has two areas where hazardous waste is accumulated or stored: the back stockroom and the pharmacy. The stockroom and pharmacy each are equipped with 15-gallon plastic bins with snap on lids for the storage of hazardous waste.

Pharmacy:

On the day of the inspection, one hazardous waste container was observed located in the pharmacy. The container was lined with a plastic bag with each of its contents in separate plastic zip lock baggies. The bin was observed to be properly closed, labeled and dated.

The Stockroom:

On the day of the inspection, one hazardous waste container was observed located in the stockroom, lined with a plastic bag and with each of its contents in separate plastic zip lock baggies. The bin was observed to be properly closed, labeled and dated. The area was observed to be equipped with a spill kit, fire extinguisher, eye wash station, and telephone.

Universal Waste:

Used Batteries are generated predominantly from customer returns. Batteries were observed to be listed on hazardous waste manifests. No used lamps were observed on the day of the inspection. Store personnel indicated that an outside electrical contractor removes used lamps from the premises. The facility must ensure compliance with the universal waste rules found at 40 CFR 273. Even if a third party manages the universal waste (e.g. an electrical contractor), the originating facility generating the waste may still be held liable for any mismanagement. The facility does not generate used oil.

Biennial Report:

No biennial report was available onsite. The facility should have filed a biennial report for calendar year 2015 prior to March 1, 2016. A copy of which must be available on site for inspection.

Waste Minimization:

The facility's waste minimization plan was reviewed. The facility has waste minimization practices in place.

SITE DEFICIENCIES:

The facility is currently operating as a CESQG and consequently no violations were cited.

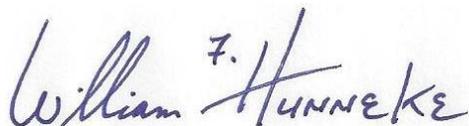
COMMENTS:

The importance of remaining vigilant about the volume of P-Listed hazardous waste was discussed with Ms. Hill. It is recommended that when shipping hazardous waste, someone review the manifest with the transporter to ensure that the quantity of P-listed waste is counted correctly. Only the residual contents of P-listed containers should be part of the facility's P-Listed weight calculation.

The facility must ensure that it files a biennial report for calendar year 2015 prior to March 1, 2016.

CONCLUSIONS:

It is beneficial if the facility can continue to demonstrate its operational status as CESQG. If the facility actually operates as a LQG, the facility must comply with all applicable LQG requirements. Currently the facility is not in compliance with all of the requirements applicable to LQGs of hazardous waste however, because the facility was operating as a CESQG, no violations were cited.



Name
Environmental Senior Specialist, NCDEQ

April 4, 2016
Date

Copy of report delivered to facility contacts